



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

**THE CITY OF NEW YORK
LAW DEPARTMENT**
100 CHURCH STREET
NEW YORK, NY 10007

**APPLICATION GRANTED
SO ORDERED** *Vern Bro*
VERNON S. BRODERICK
U.S.D.J.

The case is hereby stayed until further order of the Court. The parties are directed to submit a joint status letter, updating the Court on the status of mediation, every sixty days. The Clerk of Court is respectfully directed to stay this case.

Dated: February 26, 2024

Honorable Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Westbrook v. City of New York Department of Education, et al.* 23-cv-3164 (VSB)

Dear Judge Broderick:

I am the Special Assistant Corporation Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, assigned to appear for the New York City Department of Education and seven current and former principals and assistant principals (the “Defendants”) in the above-referenced action. On behalf of Defendants and the pro se Plaintiff, I respectfully submit this joint letter motion for a stay of discovery pending the outcome of mediation.

On November 9, 2023, the Court issued a case management plan and scheduling order (ECF Docket No. 44), which directed all fact discovery to be completed by March 8, 2023. The parties have exchanged document requests and interrogatories.

Pro bono mediation counsel appeared on January 30, 2024 (ECF Docket No. 50), and a prospective mediator recently contacted counsel to discuss a mediation schedule. The parties proposed a mediation in late March.

Plaintiff seeks to recover ten million dollars for alleged wrongful acts dating back to 2013 and has indicated that he may call any of seventy-eight witnesses (ECF Docket No. 49) at a three-week trial (ECF Docket No. 41). The parties would like to direct their attention to exploring a mutually-agreeable resolution of Plaintiff’s claims through mediation and respectfully request that discovery be stayed pending the outcome of mediation.

Respectfully Submitted,

s/Noah Potter
Special Assistant Corporation Counsel

s/ Alonzo Westbrook